

SEP 4 2018

IN THE UNITED STATES DISTRICT COURT Mark C. McCartt, Clerk
FOR THE NORTHERN DISTRICT OF OKLAHOMA U.S. DISTRICT COURT

UNITED STATES OF AMERICA,) Case No. ~~18 CR 183 JED~~
)
Plaintiff,) INDICTMENT
) [COUNTS 1, 3, 5, 7, 9, and 11: 18
v.) U.S.C. § 1951 – Obstruct, Delay, and
) Affect Commerce by Robbery;
TREVEON MONTRELL VAUGHN,) COUNT 2: 18 U.S.C. § 924(c)(1)(A)(ii)
) – Carry, Use, and Brandish a Firearm
Defendant.) During and in Relation to a Crime of
) Violence;
) COUNTS 4, 6, 8, 10, and 12: 18 U.S.C.
) §§ 924(c)(1)(A)(ii) and 924(c)(1)(C)(i)
) – Carry, Use, and Brandish a Firearm
) During and in Relation to a Crime of
) Violence;
) Forfeiture Allegation: 18 U.S.C.
) § 924(d) and 28 U.S.C. § 2461(c) –
) Robbery and Firearm Forfeiture]

THE GRAND JURY CHARGES:

INTRODUCTION

At all times material to this Indictment, Dollar General was a business engaged in the retail business of selling groceries and home items in interstate commerce within the Northern District of Oklahoma and elsewhere. In addition, Daylight Donuts and Brown's Donut Shop were businesses engaged in the retail business of selling food in interstate commerce within the Northern District of Oklahoma and elsewhere.

COUNT ONE
[18 U.S.C. § 1951]

On or about June 24, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that **VAUGHN** did unlawfully take and obtain property consisting of money from the care and custody of the employees of Dollar General, located at 2811 North Peoria Avenue, Tulsa, Oklahoma, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, in that **VAUGHN** did threaten them with a firearm if they did not give him the money in their care and custody.

All in violation of Title 18, United States Code, Section 1951.

COUNT TWO
[18 U.S.C. § 924(c)(1)(A)(ii)]

On or about June 24, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did knowingly carry, use, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1951, as set forth more fully in Count One of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE
[18 U.S.C. § 1951]

On or about July 2, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that **VAUGHN** did unlawfully take and obtain property consisting of money from the care and custody of the employees of Daylight Donuts, located at 560 North 28th West Avenue, Tulsa, Oklahoma, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, in that **VAUGHN** did threaten them with a firearm if they did not give him the money in their care and custody.

All in violation of Title 18, United States Code, Section 1951.

COUNT FOUR
[18 U.S.C. §§ 924(c)(1)(A)(ii) and 924(c)(1)(C)(i)]

On or about July 2, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did knowingly carry, use, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1951, as set forth more fully in Count Three of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 924(c)(1)(C)(i).

COUNT FIVE
[18 U.S.C. § 1951]

On or about August 10, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that **VAUGHN** did unlawfully take and obtain property consisting of money from the care and custody of the employees of Daylight Donuts, located at 4401 South Memorial Drive, Tulsa, Oklahoma, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, in that **VAUGHN** did threaten them with a firearm if they did not give him the money in their care and custody.

All in violation of Title 18, United States Code, Section 1951.

COUNT SIX
[18 U.S.C. §§ 924(c)(1)(A)(ii) and 924(c)(1)(C)(i)]

On or about August 10, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did knowingly carry, use, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1951, as set forth more fully in Count Five of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 924(c)(1)(C)(i).

COUNT SEVEN
[18 U.S.C. § 1951]

On or about August 10, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951(a)(3), and the movement of articles and commodities in such commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that **VAUGHN** did unlawfully take and obtain property consisting of money from the care and custody of the employees of Brown's Donut Shop, located at 1348 North Yale Avenue, Tulsa, Oklahoma, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, in that **VAUGHN** did threaten them with a firearm if they did not give him the money in their care and custody.

All in violation of Title 18, United States Code, Section 1951.

COUNT EIGHT
[18 U.S.C. §§ 924(c)(1)(A)(ii) and 924(c)(1)(C)(i)]

On or about August 10, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did knowingly carry, use, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1951, as set forth more fully in Count Seven of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 924(c)(1)(C)(i).

COUNT NINE
[18 U.S.C. § 1951]

On or about August 10, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951(a)(3), and the movement of articles and commodities in such commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that **VAUGHN** did unlawfully take and obtain property consisting of money from the care and custody of the employees of Daylight Donuts, located at 560 North 28th West Avenue, Tulsa, Oklahoma, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, in that **VAUGHN** did threaten them with a firearm if they did not give him the money in their care and custody.

All in violation of Title 18, United States Code, Section 1951.

COUNT TEN
[18 U.S.C. §§ 924(c)(1)(A)(ii) and 924(c)(1)(C)(i)]

On or about August 10, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did knowingly carry, use, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1951, as set forth more fully in Count Nine of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 924(c)(1)(C)(i).

COUNT ELEVEN
[18 U.S.C. § 1951]

On or about August 17, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951(a)(3), and the movement of articles and commodities in such commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that **VAUGHN** did unlawfully take and obtain property consisting of money from the care and custody of the employees of Dollar General, located at 3932 East Admiral Place, Tulsa, Oklahoma, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, in that **VAUGHN** did threaten them with a firearm if they did not give him the money in their care and custody.

All in violation of Title 18, United States Code, Section 1951.

COUNT TWELVE
[18 U.S.C. §§ 924(c)(1)(A)(ii) and 924(c)(1)(C)(i)]

On or about August 17, 2018, in the Northern District of Oklahoma, the defendant, **TREVEON MONTRELL VAUGHN**, did knowingly carry, use, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1951, as set forth more fully set forth in Count Eleven of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 924(c)(1)(C)(i).

FORFEITURE ALLEGATION
[18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]

The allegations contained in Counts One through Twelve of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

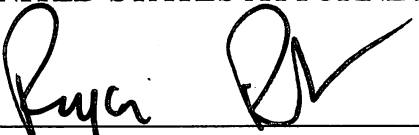
Upon conviction of any of the offenses alleged in Counts One through Twelve of this Indictment, as part of his sentence, the defendant, **TREVEON MONTRELL VAUGHN**, shall forfeit to the United States any firearm and ammunition involved in or used in the knowing commission of such offenses, including, but not limited to:

FIREARM AND AMMUNITION

1. Ruger Model LCP, .380 caliber firearm, bearing serial number 37024683, with extended magazine; and
2. Thirteen rounds of .380 ammunition.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

R. TRENT SHORES
UNITED STATES ATTORNEY



RYAN M. ROBERTS
Assistant United States Attorney

A TRUE BILL

/s/ Grand Jury Foreperson
Grand Jury Foreperson